

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

**BOBBY BLAND, DANIEL RAY CARTER,
JR., DAVID W. DIXON, ROBERT W.
MCCOY, JOHN C. SANDHOFER, and
DEBRA H. WOODWARD**

Plaintiffs,

CASE NO. 4:11-CV-45

v.

**B.J. ROBERTS, individually and in his official
capacity as Sheriff of the City of Hampton,
Virginia**

Defendant.

DECLARATION

I, John Sandhofer, having direct knowledge of the information set forth herein, hereby depose and declare as follows:

1. I am a citizen and resident of the Commonwealth of Virginia and the United States. I maintain my principal residence at 3775 Kecoughtan Road, Apartment 2, Hampton, Virginia 23669.

2. From February 2008 to December 2009 I was employed as a Deputy Sheriff within the Hampton Sheriff's Office under B.J. Roberts. I served as a sworn, uniformed Deputy Sheriff. I served in the civil process division at the time of my termination, but served as a jailor for 19 of my 22 months with the Hampton Sheriff's Office. I had no role in making policy for the Hampton Sheriff's Office. My communications with the public were relatively limited. I had no leadership responsibilities within the office. I was not a confidant of the Sheriff or a custodian of any confidential information.

Exhibit 9

3. While I was employed in the Hampton Sheriff's Office, I never served as a "law enforcement officer." I never attended the "Basic Law Enforcement" course required by DCJS in order to serve in that capacity. I always served in the Hampton Sheriff's Office as a jailor and briefly as a civil process server. I never exercised any power of arrest while employed as a deputy within the Hampton Sheriff's Office. I was told that the Sheriff did not want us to exercise any power of arrest. If we saw a criminal act we should detain that person and contact Hampton Police Division.

4. My supervisor at the time of my termination was Sergeant Linda Perkins.

5. At all times during my employment as a Deputy in the Hampton Sheriff's Office, I performed in an exemplary manner. I always received "average" and "above average" performance evaluations. I was never counseled for disciplinary reasons or informed of any deficiencies in my performance.

6. In November 2009, Sheriff Roberts was up for re-election for the office of Sheriff of the City of Hampton.

7. I observed Sheriff Roberts use the resources and manpower of his office on several different occasions in support of his campaign events and re-election efforts.

8. Immediately upon my hiring as a deputy in the Hampton Sheriff's Office, or shortly thereafter, I was placed on Sheriff Roberts' golf tournament committee—which funds his campaign. I was the only rank-and-file deputy on the committee. I believe I was placed on the committee because of my prior role as executive director of a prominent downtown Hampton marketing organization. Colonel Bowden and other senior officers consulted with me many times about obtaining support and campaigning for the Sheriff in downtown Hampton. In 2008, I provided significant levels of this kind of support. Once Jim Adams announced his candidacy

for the office of sheriff, I restricted my activities in this regard very significantly. Colonel Bowden directly asked me in 2009 to obtain prominent sign locations from downtown Hampton businesses. I did not comply with her request. I was actually ordered (not asked, not requested) to work the polls on Election Day by Lieutenant Miranda Harding and I declined. I knew that she was angry at me for this.

9. I attended a cookout co-hosted by Ramona Larkins and Danny Carter in late August of 2009. Robert McCoy also attended the cookout. Carter invited Jim Adams to attend and he did. No later than early October, photographs of the event were posted on Facebook. They are attached hereto as **Exhibit A**. Adams' attendance at the event created a swirl of rumors at the office. I know that Ramona Larkins was interrogated by senior management about the nature of the event.

10. I supported Jim Adams for Sheriff. During the 2009 campaign season, I affirmatively expressed my support for Adams to several persons. I did not do this at work. I was never disruptive at work nor disrespectful to Sheriff Roberts.

11. I attended several of the campaign debates in the 2009 election cycle with my girlfriend, Jennifer L. Strube. I often rode with my girlfriend to these events in her car and she sometimes gave me rides to work. She had a "Jim Adams" bumper sticker on her car and this was mentioned to me by Sergeant John Meyers during the campaign. In addition Sheriff Roberts met her as did several other senior members of the Hampton Sheriff's Office.

12. Major Richardson was in charge of selling tickets to the Sheriff's barbecue and golf tournament. He would frequently tell employees, "you either sell the tickets or you buy them." This statement was often repeated by shift supervisors.

13. I have heard Sheriff Roberts' senior officers make the following statements to low-level Hampton Sheriff's Office employees on many occasions:

- a) "If you don't support the Sheriff, you're going to be out of here" (Major Richardson, Major Wells-Major);
- b) "If you don't support the Sheriff, you are not going anywhere" (Sergeant T. Ford);
- c) "Be sure you are supporting the right person" (Sergeant L. Perkins);
- d) "It is in your best interest to support the sheriff" (Sergeant L. Perkins).

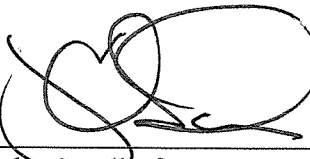
14. I saw Danny Carter's and Robert McCoy's Facebook postings on Jim Adams' campaign Facebook site in late summer of 2009.

15. In late summer of 2009, Sheriff Roberts spoke to a meeting of my co-workers and myself. The meeting was of administrative staff and court services personnel. Bland and Woodward attended this meeting. He appeared to be upset with what he considered to be open opposition to his candidacy for Sheriff. He began by noting and expressing his displeasure that certain employees were openly on Jim Adams' campaign Facebook page supporting him. He then made a statement that included the following: "I am going to have this job as long as I want it. My train is the long train. I will be Sheriff until I don't want to be Sheriff. Don't get on the short train with the man I fed for sixteen years. This is a bad economy and people are knocking down my door for these jobs."

16. I was terminated shortly after the election. Prior to my termination, none of my supervisors expressed any sort of dissatisfaction with my job performance.

I declare under penalty of perjury under the laws of the United States that the foregoing statement is true and correct.

Date: 23 DEC 2011



John Sandhofer

EXHIBIT A
To Sandhofer
Declaration



